

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
Grant Johnson,

Plaintiff,

Case No: 1:22-cv-10861 (PGG)

-against-

Esports Entertainment Group, Inc.,

Defendant.

----- X

**DEFENDANT'S OBJECTIONS TO
PLAINTIFF'S FIRST INTERROGATORIES**

1. How much did Defendant's gross revenue increase as a result of Defendant's July 13, 2021 acquisition of Bethard Group Limited (Bethard). State how Defendant calculated this amount, who calculated it, and identify all documents showing the increase in gross revenue.

Response:

Defendant objects to this interrogatory pursuant to Local Rule 33.3(a) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (the "Local Rules"), because this interrogatory seeks information that is outside the scope permitted by the Local Rules. According to Local Rule 33.3(a): "interrogatories will be restricted to those seeking names of witnesses with knowledge of information relevant to the subject matter of the action, the computation of each category of damage alleged, and the existence, custodian, location and general description of relevant documents, including pertinent insurance agreements, and other physical evidence, or information of a similar nature."

2. How much did Defendant's gross revenue increase as a result of Defendant's March 1, 2021 acquisition of Lucky Dino Gaming Limited (Lucky Dino). State how Defendant calculated this amount, who calculated it, and identify all documents showing the increase in gross revenue.

Response:

Defendant objects to this interrogatory pursuant to Local Rule 33.3(a) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (the “Local Rules”), because this interrogatory seeks information that is outside the scope permitted by the Local Rules. According to Local Rule 33.3(a): “interrogatories will be restricted to those seeking names of witnesses with knowledge of information relevant to the subject matter of the action, the computation of each category of damage alleged, and the existence, custodian, location and general description of relevant documents, including pertinent insurance agreements, and other physical evidence, or information of a similar nature.”

3. For the year 2021, what were the “annual target performance”, the “Company’s annual performance”, and the percent relationship between the two, as those terms are used at section 3.03 of the Employment Agreement (ECF 17-1). State how Defendant calculated these amounts, who calculated them, and identify all documents showing these amounts.

Response:

Defendant objects to this interrogatory pursuant to Local Rule 33.3(a) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (the “Local Rules”), because this interrogatory seeks information that is outside the scope permitted by the Local Rules. According to Local Rule 33.3(a): “interrogatories will be restricted to those seeking names of witnesses with knowledge of information relevant to the subject matter of the action, the computation of each category of damage alleged, and the existence, custodian, location and general

description of relevant documents, including pertinent insurance agreements, and other physical evidence, or information of a similar nature.”

Dated: Mineola, New York
June 12, 2023

**MELTZER, LIPPE, GOLDSTEIN &
BREITSTONE, LLP**

By:



Michael H. Masri, Esq.
Steven E. Frankel, Esq.
Attorneys for Defendant
Esports Entertainment Group, Inc.
190 Willis Avenue
Mineola, New York 11501
(516) 747-0300

To: Alan L. Frank, Esq.
Alan L. Frank Associates, P.C.
Attorneys for Plaintiff
Grant Johnson
45 Broadway, Suite 720
New York, New York 10006